

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GEORGE IVERSON, Individually,

Plaintiff,

VS.

SIMON PROPERTY GROUP, L.P., a Delaware Limited Partnership, and WMACH, LLC, a Massachusetts Limited Liability Company,

CASE NO.: 04-CV-12077-RWZ-LPC

MOTION OF THE PLAINTIFF TO PERMIT COUNSEL
TO APPEAR PRO HAC VICE

In accordance with 83.5.3(b) of the Local Rules of the United States District Court District of Massachusetts that governs the admission and practice of attorneys in said District Court, the undersigned respectfully moves for the admission of John P. Fuller, Esquire, 12000 Biscayne Blvd., Suite 609, North Miami, Florida 33181, (305) 891-5199, for purposes of appearing as counsel on behalf of Plaintiff, George Iverson, in the above-styled case.

John P. Fuller certified herewith that he has studied the Local Rules of this Court and is a member in good standing of the Florida Bar; the United States District Court for the Southern, Middle and Northern Districts of Florida, as well as the United States Court of Appeals for the Fifth and Eleventh Circuits. Mr. Fuller's Florida Bar Number is 0276847. There are no disciplinary proceedings against Mr. Fuller in any jurisdiction. A certificate of good standing from the Clerk of the Florida Supreme Court is attached hereto as Exhibit A. Mr. Fuller is a partner with the law firm of Fuller, Fuller & Associates, P.A. and has been a member of the Florida Bar for over twenty (20) years. An Affidavit of John P. Fuller in Support of this Motion to Admit Counsel Pro Hac Vice is

attached hereto as Exhibit B.

In further support of this motion, it is hereby designated that O. Oliver Wragg is a member of the Bar of this Court. He is also a person to whom the Court and Counsel may readily communicate and upon whom papers may be served.

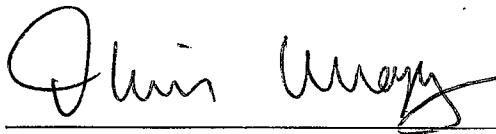
Mr. Fuller is familiar with the Local Rules of the United States District Court for the District of Massachusetts and his application for leave to practice in this court is on motion of a member of the bar of this court, who has already appeared as counsel for the Plaintiff, George Iverson. Additionally, Mr. Fuller has also submitted the required \$50.00 filing fee to the Clerk of the U.S. District Court.

WHEREFORE, the plaintiffs request that this Court grant John P. Fuller permission to appear before this Court pro hac vice.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for plaintiff made a good faith attempt to obtain concurrence to the relief sought in this motion and counsel for defendant has been unavailable.

Respectfully submitted,



O. Oliver Wragg, Esquire
of Counsel
FULLER, FULLER AND ASSOCIATES, P.A.
(BBO#: 643152)
12000 Biscayne Blvd., Suite 609
North Miami, Florida 33181
Tel: (305) 891-5199
Fax: (305) 893-9505

I hereby certify that a true and correct copy of the foregoing has been furnished to Jennifer Martin Foster, Esq.; Greenberg Traurig LLP; One International Place; Boston, Massachusetts 02110 via e-mail on this 7 day of DEC. 2004.

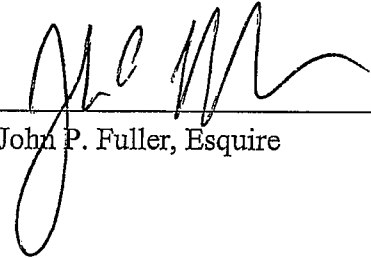
AFFIDAVIT OF JOHN P. FULLER

COMES NOW John P. Fuller and under oath does depose and say as follows:

1. I am a member of the bar in good standing in every jurisdiction where I am admitted to practice.
2. There are no disciplinary proceedings pending against me in any jurisdiction.
3. I am familiar with the Local Rules of the United States District Court of the District of Massachusetts.
4. I am currently actively associated with O. Oliver Wragg, Esq. who is a member of the bar of this Court.

I hereby swear upon penalty of perjury that the foregoing Declaration is true to the best of my knowledge.

Date: 12/7/04

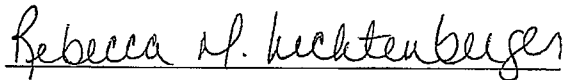


John P. Fuller, Esquire

STATE OF FLORIDA

COUNTY OF BROWARD

Sworn to (or affirmed) and subscribed before me this 7 day of Dec, 2004, by John P. Fuller



Rebecca M. Lichtenberger

Rebecca M. Lichtenberger



Rebecca M Lichtenberger
My Commission DD138410
Expires August 01, 2006

Personally Known ✓ OR Produced Identification _____

Type of Identification Produced _____

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The motion for admission to practice pro hac vice in the above captioned matter is granted.

The admitted attorney JOHN P. FULLER is permitted to argue or try this particular case in whole or in part as counsel or advocate.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission pro hac vice for the above listed case will be made on the roll of attorneys.

The attorney admitted pro hac vice must serve a copy of this Order on all other counsel in this case.

Dated:

United States District Judge

cc: John P. Fuller, Esq.
Jennifer Foster, Esq.
Court File